PHILIP MORRIS MANAGEMENT CORP. INTER-OFFICE CORRESPONDENCE
120 PARK AVENUE, NEW YORK, NY 10017-5592

TO: Distribution **DATE:** April 1, 1998

FROM: William A. Brandt, Jr. WAB
Director, Worldwide Records Management
and Senior Counsel

SUBJECT: **Reformulation of Records Management Procedures Governing Retention of Identical Copies of Disposal-Suspended Records**

As you know, the Company is required by law to retain certain records under disposal suspension in connection with ongoing tobacco litigation. The policy on disposal suspension is described in the current Records Management Manual. The affected records are identified by subject category in Appendix A to that Manual ("Topics Subject to Smoking and Health") and in a number of disposal suspension notices issued subsequently. Current policy requires that

> Copies of records that are subject to Disposal Suspension that are maintained by persons other than [the originator of the record (or principal addressee, if the record originates outside the Company)] should be retained until Disposal Suspension is lifted . . . if the copy relates to issues involved in smoking and health litigation (see Appendix A).

That policy requires you to retain "working" or "convenience" copies of disposal-suspended records relating to smoking and health litigation issues even if the copies are identical to the original record.

To enhance operating efficiency while continuing to ensure compliance with all legal requirements for disposal suspension, we have reformulated the procedures as they apply to copies of disposal-suspended records that you **make or receive on or after the date of this memo**. Going forward, you may dispose of such copies, **but only if two conditions are met**:

1. the copies are identical to the original record and have not been written on, stapled to other documents or altered in any other way; **and**

2. the original reflects (for example, by "cc", reference to a department or unit of which you are a member, or attached distribution list appearing on or with your copy) that a copy was sent to you.

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This reformulation of disposal suspension procedures does **not** apply to copies already in your possession; nor does it apply to copies you receive from Philip Morris International, Philip Morris Capital Corporation, our food or beverage companies, or Philip Morris locations outside of the United States.

All other disposal suspension procedures prescribed in the Records Retention Manual and current notices of disposal suspension remain in effect without change, including the procedures for retention of disposal-suspended electronic records. Electronic records that are (1) the subjects of previously issued disposal suspension notices dated April 6, 1994, April 21, 1994, May 4, 1994 and July 28, 1994; or (2) incapable of being printed must continue to be maintained in electronic form. All other electronic records subject to disposal suspension must continue to be printed and retained only in printed form (do not use "zip" drives, diskettes or other similar media for this purpose).

If you have any questions regarding this memo, please contact me (N.Y. ext. 3572) or Bill Lynch (N.Y. ext. 4019).

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